RETAIL DESIGN AND DEVELOPMENT STANDARDS

Large Format Retail Maximum Size Limits

Urban Design & Planning – Comprehensive Planning
July 19, 2010
Prepared by Dan McAuliffe, LEED AP

Purpose

The purpose of this white paper is to address questions related to size of large format retail. Within the Retail Design and Development Standards project, large format retail is defined as Tier 2 and 3 developments, which currently applies to buildings greater than 30,000 square feet. The questions this paper will address are as follows:

1. Should there be a limit on the size or footprint of a building within the Community Commercial (CC) district? If so, what should it be?

2. If a building size limit is created for Community Commercial, should Moderate Commercial (MC) also have a size limit? If so what should it be?

3. Should height limit in Community Commercial, which is currently 80 feet, be lowered? If so, what should it be?

These questions only address the size or footprint of individual buildings, and do not address individual tenant space sizes or total square footage of development on a site when it contains multiple buildings.

Current Regulations

There are limited land use districts that could potentially allow large format retail development to occur. These include the Regional, Town and Station Centers (Downtown, Civic Neighborhood, and Rockwood Town Center and Station Centers) and the Community Commercial and General Commercial districts.

The Regional, Town and Station Center districts do not have a building size or footprint limit. However, these districts have other land use controls, such as a minimum Floor Area Ratio (FAR) or require a second story, which make conventional single-story large format retail development unlikely.

The Community Commercial and General Commercial districts currently do not have a building size or footprint limit, nor do they have a minimum density requirement (such as FAR or minimum height). Because of this combination, single-story large format retail development could occur in these districts. The exception to this is the Community Commercial node at 182nd and Glisan, which is within the Central Rockwood boundary and therefore subject to an FAR of 0.4.

The General Commercial (GC) district is an older, remnant commercial district that only is used at a few locations. It is likely that an outcome of this project will be deletion of the General Commercial district with the current GC parcels re-designated with the appropriate Corridor district. Therefore, this white paper will not further address the GC district but it is assumed that if GC designations do remain, that any new limitations of the Community Commercial district would be applied to the General Commercial district.

Building Size Standards

Land Use District	Minimum Height	Maximum Height	Maximum Retail Building Footprint Size	FAR Minimum Existing	FAR Maximum Existing
CC- Community Commercial	None	80' *	None	None**	None
MC- Moderate Commercial	None	45'*	40,000 sq. ft. if entirely commercial	None**	None
GC- General Commercial	None	65' with fire suppression 40' without fire suppression	None	None	None
Rockwood					
Rockwood Town Center (RTC)	2 Stories	None*	None	0.5:1	None
Station Center (SC)	2 Stories	80*	None	0.6:1	None
Station Center – Ruby Junction (SC-RJ)	2 Stories	80*	None	0.6:1	None
Downtown (Allowing Commercial Uses)					
Downtown Commercial Core (DCC)	None	85'	None	1	3.0 (4.5)
Downtown Mixed-Use (DMU)	None	125'	None	1	3.5 (6.0)
Downtown Transit Mid-Rise (DTM)	None	85'	None	1	3.0 (4.5)
Downtown Employment Mid-Rise (DEM)	None	70'	None	0.5	2.5 (3.0)
Downtown Commercial Low-Rise (DCL)	None	65'	None	0.5	1.0 (2.5)
Civic Neighborhood	22'+	40' to 80'	Varies	Varies	None
Transit Development District – Medium Density –Civic (TDM-C)	22'+	80' ++	None	0.4:1 south 0.6:1 north	None
Transit Development District – High Density – Civic (TDH-C)	22'+	80' ++	None ^	1.1:1	None

Table Notes:

+ = Two story frontages are required on Primary Pedestrian Streets.

* = 35' for any building containing dwelling units when located adjacent to LDR-5, LDR-7, TLDR or TR

++ = 40' for buildings with no built in fire protection.

^ = In a mixed-use developments, the maximum footprint of a free standing retail building shall 10,000 sq. ft..

~ = Only permitted in mixed-use and there is a maximum size of 10,000 sq. ft. once min. residential densities are met.

** = FAR of 0.4:1 required in Central Rockwood

Table 1: Building Standards

Role of Community Commercial

The role of the Community Commercial has significant bearing on the appropriate scale of development in this district. The Development Code gives some direction about the role of the Community Commercial district in its character description:

> *This district designation is applied to larger nodes of primarily commercial development clustered around the intersections of arterial streets. The CC district will accommodate a wide range of community-scale commercial uses, including retail, services, and offices. This district also permits housing as a secondary use, with attached dwellings being developed in conjunction with commercial construction. New buildings will be pedestrian-oriented, with parking placed behind or beside buildings.*

At the June 14th Planning Commission meeting, staff posed a series of questions to further determine the role of the Community Commercial district and its relationship to the Regional and Town Centers (Downtown, Civic Neighborhood and Rockwood). The questions included:

- Should the Community Commercial (CC) district allow development which is less, the same or more intense than the Downtown, Civic Neighborhood, and Rockwood centers?
- Should the maximum height of CC be less, the same or more than the maximum heights in Downtown, Civic Neighborhood, and Rockwood?
- Should a minimum Floor Area Ratio (FAR) be established for CC? If so, should it be less, the same or more than in Downtown, Civic Neighborhood, and Rockwood?
- Should a maximum FAR be established for CC? If so, should it be less, the same or more than in Downtown, Civic Neighborhood, and Rockwood?

The Planning Commission advised staff that the Centers should be more intense and developed at higher density than the Community Commercial district. They also stated the Community Commercial district should not be competing for development with the centers. The Planning Commission indicated the height of buildings within the Community Commercial district should be lower than, or at least not exceed, the maximum heights permitted in the Regional and Town Centers. The Stakeholder's group and the Design Commission also echoed this response.

Regulatory Framework: Limit Building Size or Building Footprint

Limiting building size and building footprint are two regulatory approaches which address different issues. Limiting building sizes fundamentally limits only the allowable space within buildings, and regulates the form of the building only to a limited extent. Limiting building footprints creates limitations on the horizontal dimensions of the building. It does not control total building size because multiple stories can be developed.

This concept can be illustrated by investigating the difference between a 100,000 square foot building size limit and a 100,000 square foot footprint limit. A 100,000 square foot building limit could result in a 100,000 square foot single-story building, or a building with two 50,000 square foot floors, or a building with three 33,000 square foot floors. A 100,000 square foot footprint limit could result in a 100,000 square foot single-story building, or a 200,000 square foot building on two floors, or a 300,000 square foot building over three floors.

In response to the Planning Commission's statements that the most intense retail development should occur within the Regional and Town Centers, whichever regulatory method is selected should allow retail of a greater scale within the Centers than in the Corridor districts. As previously mentioned the Regional, Town and Station Centers do not have a footprint limit or a maximum building size, but have minimum intensity regulations which require multiple stories or limit the potential for single-story development. If the

Community Commercial district utilized a footprint limit, it could permit multi-level large footprint buildings, which are also allowed in the Centers. This could result in large multi-level buildings shifting away from the Centers and toward the Corridor Districts, which would be an undesirable result.

If a building size limit was utilized for the Community Commercial district, the maximum intensity would be established for buildings within this district. Developments with tenants who wish to exceed this ultimate size would not be allowed in these locations, but would be permitted in the Regional and Town Centers, most likely in a multi-level format.

Recommendation: A building size limit should be established for the Community Commercial district.

Establishing a Maximum Building Size

In order to establish a recommendation for maximum building size, an analysis was performed which addressed building massing, impacts on retail types permitted, site size requirements and the creation of non-conforming developments. This analysis considered building size limits between 80,000 square feet and 120,000 square feet.

Building Massing: Walkability and Visual Impact

Building mass is critical to character of the Community Commercial district, as the buildings horizontal dimensions impact connectivity, walkability and the aesthetics of the area. Long horizontal dimensions can prevent connections to surrounding neighborhoods and commercial areas and negatively impact walkability by exceeding the pedestrian scale. Longer building walls also require greater attention to design details in order to prevent monotonous and often blank facades, which further detract from the pedestrian environment.

The dimensions of large format retail buildings were evaluated to determine at what point design strategies cease their ability to mitigate the impact of long facades. These dimensions were also compared to existing block lengths currently found in Gresham to evaluate walkability of these distances. This comparison assisted in the determination of where the scale of development creates dimensions which are not considered walkable and detract from a pedestrian environment. Because single-story development would have the greatest negative impact on walkability and aesthetics, the following analysis was performed based on this model.

80,000 Square Feet: An 80,000 square feet single story retail building would likely have approximate dimensions of 360 by 220 feet[1]. Many of the precedents contained in the Design Analysis document, created at the beginning of this project, closely correlate to the 360 foot dimension. Baldwin Park (320 feet), The Rise (350 feet), buildings at Cascade Station (320 feet) and Orenco Station (360)[2] all demonstrate design features and strategies, such as incorporating articulating features and changes in height, depth, materials and color, which mitigate their length and provide visual interest. These buildings successfully create a pedestrian-scaled environment while approaching the maximum dimension anticipated at this size.

The dimensions of an 80,000 square foot building closely resembles the block sizes developed at Gresham Station, although individual block lengths at this development range from 190 to 450 feet. This comparison illustrates that an 80,000 square foot building could be developed as a walkable, pedestrian-oriented environment which allows for substantial connections to its surroundings.

---

[1] Based on a 1:1.6 dimensional ratio.

[2] See Building Massing: Walkability and Visual Impact Comparison attachment for images of cited developments.

100,000 Square Feet: A 100,000 square foot single-story building would have approximate dimensions of 400 by 250 feet. One of the precedents in the Design Analysis had dimensions which approached this length: the two-story Target in Chicago (380 feet, excluding lower level parking structure). This project's design, which includes many of the strategies previously mentioned, successfully lessens the visual impact of the building's length.

The dimensions of a 100,000 square foot building resemble the approximate size of blocks north of the light rail line in the Civic Neighborhood. Although many of these blocks have not been developed at this time, these lengths are only a 10% increase over the 80,000 square foot blocks and the increase is not of a significant magnitude to substantially alter the walkability or connectivity of these blocks.

120,000 Square Feet: If the maximum building size was increased to 120,000 square feet, a single-story building would have approximate dimensions of 440 by 270 feet, which is nearly 100 feet longer than an 80,000 square foot building. Projects or specific buildings in the Design Analysis which approach and exceeded this dimension generally received negative comments from the public, likely because most design strategies, such as recesses, projections and articulating features, begin to lose their effectiveness when approaching this length. This concept can be illustrated by the unbroken wall of large format retail at the back of Cascade Station in Portland (see lower right image on attached Walkability and Visual Impact sheet). While each tenant's space is individually designed and highly articulated, the cumulative length of the spaces significantly detracts from the overall design.

These buildings, and required block lengths, approach dimensions that are no longer pedestrian-oriented. These dimensions are generally larger than commercial block sizes found within Gresham and more closely relate to length of the two primary buildings at Gresham Town Fair, which measure 875 and 550 feet. Block lengths of this scale hamper connections to surrounding areas, detracting from connectivity and walkability of the development.

Conclusion: The dimensions of a 100,000 square foot building and its required block lengths represent the longest length that could be considered walkable and pedestrian-oriented.

Impact on Retail Types

Table 2, which illustrates the most common building sizes of various types of retail, is provided for reference only. It should be noted that most retailers have several standard store models of various sizes, allowing adjustment to various contexts and regulations. The amount of deviation from values stated in the chart is unknown and past development is not always an indication of current building practices.

Retail Type	Typical Size (sf)	Sample Retailers
Home Furnishing/Furniture	300,000	Ikea
Super Center	200,000	Walmart Supercenter, Super Target, Fred Meyer
Discount Club	140,000	Costco, Sam's Club
Department Store	140,000	Nordstrom's, Macys, JC Penney, Sears
Discount Center	120,000	Walmart, Target, Kmart
Home Improvement	100,000	Home Depot, Lowe's
Apparel/Home Goods	80,000	Kohl's
Electronics	70,000	Best Buy
Outlet	60,000	Marshalls, Ross
Supermarket/Grocery	60,000	Safeway, Albertsons
Toys	45,000	Toys R Us
Sporting Goods	40,000	Sports Authority, Dicks Sporting Goods
Theater	40,000	
Craft Stores	30,000	Michaels, Joanne Fabrics
Home Furnishing	30,000	Bed Bath and Beyond
Office Supplies	25,000	Office Depot, Staples
Pets	25,000	PetSmart
Books	25,000	Barnes and Noble, Borders
Pharmacy	15,000	Walgreen's, Rite Aid

Table 2

80,000 Square Feet: A building size limit of 80,000 square feet in the Community Commercial district may create challenges for certain types of retail to enter Gresham. For example, a typical home improvement center would be required to reduce its size within the Community Commercial district, or develop within a multi-level format in the Centers. However, a home improvement center is an example of a retail type that historically has not developed in a multi-level format in most contexts.

100,000 Square Feet: The 100,000 square foot building limit within the Community Commercial district provides Gresham with opportunity to accommodate retail types up to a home improvement center but would not allow supercenters, discount stores or department stores in their standard sizes. Retail types over 100,000 square feet could develop in the Regional, Town and Station Centers but development standards would likely require a multi-level retail space or incorporating residential or other uses over the primary retail space to increase the intensity to the level required by the Development Code.

120,000 Square Feet: Increasing the size limit to 120,000 square feet may provide little benefit in accommodating additional retail types. Like 80,000 and 100,000 square foot limits, it would prevent department stores in the Community Commercial district, but would accommodate the typical scale of discount retailers. Development of this scale is also less appropriate in the Community Commercial district due to its surrounding residential context. In 10 of 11 Community Commercial nodes, a low-density residential district is the primary land use within a ¼ mile.

Conclusion: 100,000 square feet provides the best balance between allowing the most types of retail and preventing scales which are out of character with surrounding residential. Mitigating impacts on buildings over this size is difficult due to the large dimensions of the structure.

Site Sizes

Site sizes were investigated to determine what scale of development is possible on sites within the Community Commercial district and the quantity of sites that could achieve this scale.

The calculations used to estimate site size are based on single-story development, with exclusive use of surface parking. This is based on a Floor Area Ratio of 0.3, which was arrived at by estimating the space requirements of the principal structure and outbuildings, parking, service, loading and circulation areas and required landscaping in the parking area and other areas of the site.

Outbuildings and other retail spaces were included in this analysis because they are often included in large format retail development. These spaces can be an important element to the successful design of large format retail development by adding human scale and visual interest to pedestrian areas with greater concentrations of doors and windows.

Based on single-story development, an 80,000 square foot building would require a site of approximately 7.3 acres, and there are six sites in the Community Commercial district that likely could accommodate a development of this size. A 100,000 square foot building would require a site of at least 9.2 acres and within the Community Commercial district there are currently five sites over 9.2 acres which could likely accommodate a building of this scale. The largest analyzed building size, 120,000 square feet, would require approximately 11 acres; only three sites could accommodate development of this scale.

Table 3 details approximate dimensions and space requirements of large format retail developments. Additional values are shown for reference only.

Footprint Limit (sf)	Approximate Dimensions (ft)	Development Size with outlots (sf)	Site Size Required 0.3 FAR (acres)	Potential Sites in CC
40,000	*250 x 160*	*48,000*	*3.7*	
60,000	*310 x 190*	*72,000*	*5.5*	
80,000	360 x 220	96,000	7.3	6
100,000	400 x 250	120,000	9.2	5
120,000	440 x 270	144,000	11.0	3
140,000	*470 x 300*	*168,000*	*12.9*	
160,000	*510 x 320*	*192,000*	*14.7*	

Table 3

Conclusion: There is an adequate number of sites present in the Community Commercial district to accommodate a 100,000 square foot limit. A limit with this quantity of sites will not discourage development of this scale based on the scarcity of land.

Non-Conforming Developments

Adding a building size or footprint limit to the Community Commercial district will create non-conforming developments, including the 190,000 square foot Fred Meyer and shopping centers such College Square and the Oregon Trail Center (depending if common wall commercial structures in a single commercial development are counted as one building). The Development Code permits these uses to continue but states it is not intended to encourage perpetuation of these developments.

Provisions in the Code exist which allow for expansion and alteration of these buildings. These provisions trigger minimum site improvements, such as buffers, to be developed as a component of these plans. The Code also provides guidance to the termination of non-conforming status. In the event of fire or damage beyond the owner's control, if repair costs exceed 80% of the structure's value, any repair or redevelopment will be required to follow current standards in the Code. This would prevent a development which exceeded the established maximum footprint limit from rebuilding to that scale.

Conclusion: While any size limit will create non-conforming developments in the Community Commercial district, this is not a significant issue. The Development Code has provisions which address these situations and allow for the continuation of existing uses over the selected size limit.

Staff Recommendation

Staff recommends placing a 100,000 square foot building limitation on the Community Commercial district. Because multiple buildings are allowed to develop on a property, total building area could exceed 100,000 square feet. This standard provides the best balance between limiting visual impacts, enhancing connectivity and walkability while allowing many retail options.

Moderate Commercial

If a building size limit is created for the Community Commercial district, it is also important to consider a building size limit for the Moderate Commercial district. Currently, Moderate Commercial has a 40,000 square foot footprint limit, no maximum building size and permits a maximum height of 45 feet, which could accommodate three levels of retail space. This would allow for a building of up to 120,000 square feet, which exceeds staff's recommended building size limit for Community Commercial. Reducing the allowable building size would be consistent with the Planning Commission's recommendation to move the most intense development toward the Regional and Town Centers.

The Development Code provides the following stated character description of the Moderate Commercial district:

> *The MC district is applied to smaller nodes of commercial activity clustered around key intersections. These districts are intended to function primarily as locally-oriented centers serving smaller trade areas. Permitted development types include commercial retail, service, and office uses. New housing at moderate densities may also be permitted, when developed in conjunction with commercial uses. Design standards will ensure a strong pedestrian orientation for new development.*

Recommendation: Staff recommends maintaining the 40,000 square foot footprint limit and creating an 80,000 square foot building size limit. The Planning Commission has also expressed a desire to permit groceries stores within the Moderate Commercial district, which typically exceed the 40,000 square foot footprint limit. Staff recommends permitting an exception to the footprint limit for grocery stores and allowing these footprints up to 60,000 square feet.

Proposed Land Use District Changes	**Maximum Building Footprint Size (SF)**	**Maximum Building Size (SF)**
MC- Moderate Commercial	40,000 sf 60,000 sf (grocery stores)	80,000 sf
CC- Community Commercial	-	100,000 sf

Table 4

Building Height: Community Commercial

In conjunction with limiting building size, an analysis was prepared to evaluate the impacts of reducing the maximum building height in the Community Commercial district, which currently permits buildings up to 80 feet (this limit is subject to Height Transition Standards when abutting low-density residential districts). As previously stated, Planning Commission, Design Commission and members of the Stakeholders group suggested that building heights in the Community Commercial district should be lower than, or at least not higher than, those planned in the Regional and Town Centers. These groups also indicated a preference to allow multi-level retail to occur within the Community Commercial district.

Existing Height Limits	
CC- Community Commercial	80’
MC- Moderate Commercial	45’
Rockwood	80' to Unlimited
Downtown (Allowing Commercial Uses)	65'-125'
Civic Neighborhood	40’ to 80’

Table 5

Building heights in the Community Commercial district should also respond to the significant presence of low-density residential districts in its surrounding area and lowering the maximum building height in the Community Commercial will lessen impacts on residential properties which abut the district. The Community Commercial should allow multi-level development which compliments and does not detract from the surrounding lower-density neighborhoods. Very tall buildings should not be permitted in the Community Commercial district because they have the potential to create conflicts with the surrounding neighborhoods and are more appropriate in the more intense Regional and Town Centers

Recommendation: A 45 foot height limitation should be established for the Community Commercial district. The proposed 45’ height limit matches the current maximum height allowed in the Moderate Commercial district

While commercial floor heights are variable, the proposed 45 foot height limit should be to accommodate the following:

- Retail Building: 2-3 stories (15 to 20 foot floor heights)
- Office Building: 3 stories (12 to 15 foot floor heights)
- Mixed-Use Building: 3-4 stories (10 to 15 foot floor heights)